

CH-SDP

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

FILED BY *JE* D.C.  
05 JUN -6 AM 6:50  
ROBERT R. DI TROLIO  
CLERK, U.S. DIST. CT.  
W.D. OF TN, MEMPHIS

BARBARA WILLINGHAM,

Plaintiff,

v.

WORLDWIDE MORTGAGE CORP., ET AL.,

Defendants.

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

NO. 03-2569-D/P

04-2391

**MOTION FOR EXTENSION OF TIME TO RESPOND TO NOVASTAR'S  
REQUESTS FOR ADMISSIONS AND, IN THE ALTERNATIVE, FOR LEAVE  
TO WITHDRAW ANY AND ALL ADMISSIONS DEEMED ADMITTED**

COMES NOW Plaintiff, Barbara Willingham, by her undersigned attorneys, and moves the court pursuant to Rule 36(b) of the Federal Rules of Civil Procedure, for an order granting Plaintiff an extension of time from April 21, 2005 until May 9, 2005 to serve responses to Novastar's Requests for Admissions and, in the alternative, to withdraw any and all responses deemed admitted.

In support of the Motion, the Plaintiff relies upon her Memoranda in Support of their Motions to Extension of Time and, in the Alternative, for Withdrawal of Admissions and their Certificates of Consultation, filed contemporaneously herewith.

WHEREFORE, Plaintiff moves this Court for an extension of time, until May 9, 2005, within which to respond to the Requests for Admissions, and in the alternative, for withdrawal of any or all of its responses deemed admitted.

**MOTION GRANTED**

DATE: 6-3-2005

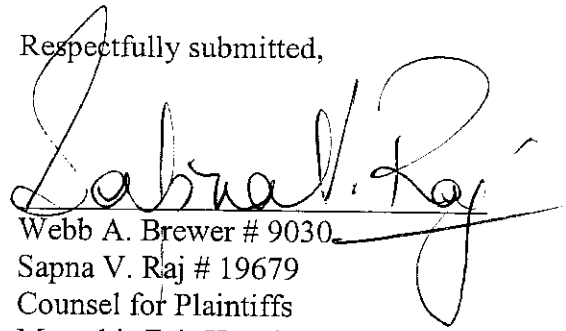
*Bernice Bouie Donald*

**BERNICE BOUIE DONALD  
U.S. DISTRICT JUDGE**

102

Dated: May 9, 2005.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Sapna V. Raj". The signature is written in black ink and is positioned above the printed contact information.

Webb A. Brewer # 9030

Sapna V. Raj # 19679

Counsel for Plaintiffs

Memphis Fair Housing Center

Memphis Area Legal Service, Inc.

109 N. Main St. Suite 201

Memphis, TN 38103

(901) 432-4663

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Requests for Extension of time for Responses to Requests for Admissions were served by regular United States Mail this the 9th day of May 2005, on the following:

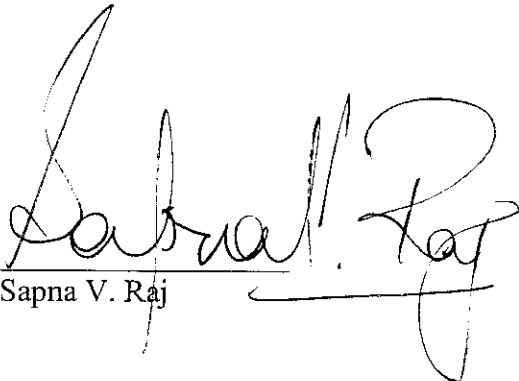
Evan Nahmias  
McDonald Kuhn  
Pembroke Square  
119 South Main St. Suite 400  
Memphis, TN 38103

Roscoe Porter Feild  
Burch, Porter, & Johnson  
130 N. Court Avenue  
Memphis, TN 38103

Bruce Alexander  
Weiner, Brodsky, Sidman, Kider, P.C.  
1300 19<sup>th</sup> Street, N.W. 5<sup>th</sup> Floor  
Washington, D.C. 20036

John S. Golwen  
Bass Berry & Sims  
100 Peabody Place, Suite 900  
Memphis, TN 38103

Timothy Hayes  
The Hardison Law Firm  
119 South Main, Suite 300  
Memphis, TN 38103

  
Sapna V. Raj



## Notice of Distribution

This notice confirms a copy of the document docketed as number 102 in case 2:04-CV-02391 was distributed by fax, mail, or direct printing on June 9, 2005 to the parties listed.

---

Virginia M. Patterson  
THE HARDISON LAW FIRM  
119 S. Main St.  
Ste. 300  
Memphis, TN 38103

Evan Nahmias  
MCDONALD KUHN  
119 South Main St.  
Ste. 400  
Memphis, TN 38103

Mitchel H. Kider  
WEINER BRODSKY SIDMAN KIDER, P.C.  
1300 19th Street, N.W.  
5th floor  
Washington, DC 20036--160

Loys A. Jordan  
MCDONALD KUHN  
119 South Main St.  
Ste. 400  
Memphis, TN 38103

W. Timothy Hayes  
THE HARDISON LAW FIRM  
119 S. Main St.  
Ste. 300  
Memphis, TN 38103

John S. Golwen  
BASS BERRY & SIMS PLC- Memphis  
100 Peabody Place  
Ste. 900  
Memphis, TN 38103

R. Porter Feild  
BURCH PORTER & JOHNSON  
130 N. Court Avenue  
Memphis, TN 38103

Christopher S. Campbell  
HARRIS SHELTON DUNLAP COBB & RYDER  
One Commerce Square  
Ste. 2700  
Memphis, TN 38103

Webb A. Brewer  
MEMPHIS AREA LEGAL SERVICES, INC.  
109 N. Main Street  
Ste. 201  
Memphis, TN 38103

Bruce E. Alexander  
WEINER BRODSKY SIDMAN KIDER, P.C.  
1300 19th Street, N.W.  
5th floor  
Washington, DC 20036--160

Kristen C. Wright  
BASS BERRY & SIMS PLC- Memphis  
100 Peabody Place  
Ste. 900  
Memphis, TN 38103

John L. Ryder  
HARRIS SHELTON DUNLAP COBB & RYDER  
One Commerce Square  
Ste. 2700  
Memphis, TN 38103

Susan L. Ratner  
MEMPHIS AREA LEGAL SERVICES, INC.  
109 N. Main Street  
Ste. 201  
Memphis, TN 38103

Sapna V. Raj  
MEMPHIS AREA LEGAL SERVICES, INC.  
109 N. Main Street  
Ste. 201  
Memphis, TN 38103

Honorable Bernice Donald  
US DISTRICT COURT